

**GOVERNMENT/INDUSTRY AERONAUTICAL CHARTING FORUM**  
**Instrument Procedures Subgroup**  
**November 28-29, 2000**  
**RECOMMENDATION DOCUMENT**

**FAA Control # 00-02-225**

**SUBJECT:** FAAO 8260.3, paragraph 251b(2)(c) – Visual Area Obstacle Clearance.

**BACKGROUND:** When evaluating for obstacles in the visual assessment area, if the 20:1 OIS is penetrated, the option in sub-paragraph “c” states: “Do not publish a VDP, limit minimum visibility to 1 mile, **and do not authorize night IFR operations** to this runway. The question is the definition of “IFR operations” and how does this paragraph affect Visual Approaches conducted while on an IFR flight plan?

**DISCUSSION:** FAAH 7110.65M, paragraph 7-4-1, states “A visual approach is an ATC authorization for an aircraft on an IFR flight plan to proceed visually to the airport of intended landing; **it is not an instrument approach procedure.**” The AIM, paragraph 5-4-20, states: “Visual approaches **are an IFR procedure conducted under IFR** in visual meteorological conditions.” In the TERPS manual we say: “Do not publish a VDP, limit visibility to 1 mile, and **do not authorize night IFR operations to this runway.**” Interpretation of these paragraphs leads us to believe that a Visual Approach is an “IFR operation” and cannot be conducted at night to a runway that has unlighted 20:1 penetrations.

The question was presented to FAA AFS-420 and the response was that this paragraph addresses the pilot's transition from instruments to visual references for landing in less than VFR conditions. TERPS does not address design or obstruction clearance standards for a visual approach; therefore, TERPS is not applicable to visual approaches. TERPS regulates instrument procedures designed under 8260 series orders. A visual approach is visual navigation conducted in VFR conditions by an aircraft operating on an IFR flight plan. These approach operations are regulated by a different series of directives.

This begs the question of how are we to explain that we won't allow use of the “IAP” to the runway at night because it is unsafe but if cleared for the Visual Approach at night, it's okay? The fact remains that in either case, the obstacle is unlit and not visible at night for avoidance.

**RECOMMENDATION:** Gain consensus from forum participants on what direction to take to resolve different interpretations. Four options, in no particular order, to consider are:

A. Change paragraph 251b(2)(c) to read “...do not authorize instrument approach procedures at night to the affected runway”.

B. Change paragraph 251b(2)(c) to read “...and annotate the procedure ‘CIRCLING TO RWY XX NA AT NIGHT’, or ‘STRAIGHT-IN MINS NA AT NIGHT,’ as appropriate.

C. Change paragraph 251b(2) to eliminate the night restriction and annotate the procedure with the location of the obstruction and informing the pilot if it is marked and lighted or not. This would be done by deleting paragraph 251b(2)(c) and changing paragraph 251b(2)(b) to read: "Do not publish a VDP, limit visibility to 1 mile, and state on the procedure the location of the penetrating obstacle and whether the obstacle is marked and lighted."

D. FAA Airports Division/DoD Airfield Operations personnel establish criteria that denies **all** night arrival operations to a runway that has obstacles penetrating the TERPS Visual Portion of the Final Approach Segment area 20:1 OIS that are not lit.

**COMMENTS:** This recommendation affects Orders 8260.3B and 7110.65, and the AIM.

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**INITIAL DISCUSSION (Meeting 00-02):** Tom Schneider, AFFSA/XOI, presented this issue on behalf of the USAF. Their issue centers around apparent contradictions between TERPS paragraph 251b(2)(c), the AIM and Order 7110.65 regarding Visual Approaches. He offered four possible solutions to clarify the issue. Dave Eckles, AFS-420, stated the Flight Standards position is that a visual approach is an air traffic procedure whereby an aircraft on an IFR flight plan is authorized to proceed visually, and clear of clouds, to the airport. TERPS does not address design or obstruction clearance standards for a visual approach; therefore, TERPS is not applicable to visual approaches. After discussion, the group recommended that the issue should be resolved by clarifying TERPS paragraph 251b(2)(c) and that AFFSA recommendation "B" or "D" would be acceptable. The Tom agreed to take the issue to the TWG February meeting and report results at the next meeting. **ACTION: AFFSA.**

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**MEETING 01-01:** Tom Schneider, AFFSA, presented a status update paper on the issue. Tom presented the consensus of the IP Subgroup meeting 00-02 to the TERPS Working Group (TWG). As a result, TERPS Change 19 will reflect the following change to paragraph 251b(2) (c): "Do not publish a VDP, limit minimum visibility to 1 mile, *and publish a note denying the approach to the straight-in runway at night.*" Tom briefed that the TWG also noted that further clarification was necessary to address circling restrictions at night when there are 20:1 surface penetrations for the runway being circled to. A new paragraph 251b(3) will be included in TERPS Change 19, as follows: "(3) *If the 20:1 surface is penetrated on circling runways, mark and light the penetrating obstacles or publish a note denying night circling to the affected runway.*" It was recommended this issue be carried as open/inactive pending publication of TERPS Change 19. The group concurred. **ACTION: Inactive (AFS-420).**

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